

REMARKS

Pre-appeal brief review is appropriate in this application because the rejections in the May 31, 2006 Final Office Action contain clear deficiencies.

Claims 1-64 are currently pending. The claimed invention, as recited in independent claims 1, 33, and 49, requires a website that allows “a user in communication with the website to create a plurality of event pages describing an event and a registration page associated with the event.” The cited references in the Final Office Action, discussed below, clearly fail to disclose at least these limitations.

I. Claims 1-10, 12-21, 23-40, 42-56, and 58-64

Claims 1-10, 12-21, 23-40, 42-56, and 58-64 were rejected as being anticipated by U.S. Patent Application No. 6,029,141 (“Bezos”). However, for the reasons set forth below, Bezos fails to disclose at least the limitations of the claimed invention discussed above.

Bezos is directed to an Internet-based referral system where individuals can register to become associates of the referral system by visiting a merchant website. *See* Bezos, Abstract. The merchant website provides potential associates with registration instructions and an online application form. *See* Bezos, col. 10, ll. 1-9; Figures 1 and 2. The potential associates apply to become associates by filling in the online application form. *See* Bezos, col. 10, ll. 10-17; Figures 1 and 2. The merchant website initiates enrollment software that processes the application information obtained through the online application form and determines whether to accept the application. *See* Bezos, col. 10, ll. 29-37; Figure 2. Therefore, in Bezos, the merchant website allows the potential associates to read registration instructions and to fill in the online application form. On the contrary, the claimed invention recites a website that allows “a user in

communication with the website to create a plurality of event pages describing an event and a registration page associated with the event.” Thus, in Bezos, individuals can retrieve and interact with *existing* pages from the merchant website (e.g., pages containing registration instructions, the online application form), but cannot *create* any *new* pages. This is different from the claimed invention, which allows users to “create a plurality of event pages” by communicating with the website. As a result, Bezos clearly fails to disclose at least the limitations of independent claims 1, 33, and 49 discussed above.

Thus, Bezos clearly fails to disclose each and every limitation of the claimed invention.

II. Claims 11, 22, 41, and 57

Claims 11, 22, 41, and 57 were rejected as being obvious in view of Bezos and U.S. Patent No. 6,507,870 (“Yokell”). Claims 11 and 22 are dependent on independent claim 1; claim 41 is dependent on independent claim 41; and claim 57 is dependent on independent claim 49. As discussed above, independent claims 1, 33, and 49 require a website where a user can create a plurality of event pages and a registration page by communicating with the website. Yokell is directed to a system for providing a DSL service for a loop. *See* Yokell, Abstract. Yokell provides web-based software allowing customers to self qualify and on-line order via a web page to determine whether they can receive high speed xDSL services, which is different from a website where a user can create a plurality of event pages and a registration page by communicating with the website, as required by the claimed invention. Thus, Yokell, like Bezos, clearly fails to disclose all the limitations of the claimed invention or supply that which Bezos lacks.

Thus, Bezos and Yokell, whether taken singly or in combination, clearly fail to disclose each and every limitation of the claimed invention.

III. Summary

Based on the foregoing, Applicants respectfully submit that each of the pending rejections suffers from a clear deficiency in the prima facie case asserted in support of the rejection. The Commissioner is respectfully requested to contact the undersigned should it be beneficial for advancing prosecution of the present application.

Respectfully Submitted,
JUSTIN T. NGUYEN ET AL.

Date: October 2, 2006

By: /Brian M. Hoffman/

Brian M. Hoffman, Reg. No. 39,713
Attorney for Applicants
FENWICK & WEST LLP
801 California Street
Mountain View, CA 94041
Tel.: (415) 875-2484
Fax: (415) 281-1350